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April 1, 2025

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

4/2/25 
John G. Koeltl, U.S.D.J.

Re: *In re Adobe Inc. Sec. Litig.*, No. 1:23-cv-09260-JGK (S.D.N.Y.)

Dear Judge Koeltl:

On behalf of Plaintiffs, we write, pursuant to Rule I.C of the Court's Individual Practices, to respectfully request an extension of the schedule for filing and briefing Plaintiffs' forthcoming motion for leave to file a second amended complaint. Under the schedule set forth in the Court's March 27, 2025 Memorandum Opinion and Order, Plaintiffs must file their motion and proposed complaint by April 17, Defendants must respond within 21 days (May 8), and Plaintiffs must file a reply 10 days later (May 18). *See* ECF No. 68 at 48.

While we are mindful of the need to move forward expeditiously (and of course intend to do so), Plaintiffs' counsel have limited availability in April due to religious days of observance (Passover and Christian holidays, April 12-20), and previously scheduled international travel plans, as well as other commitments that are unfortunately challenging to reschedule. To provide adequate time to evaluate the Opinion and prepare a proposed pleading, Plaintiffs respectfully propose the following schedule for the Court's consideration:

May 1: Plaintiffs to file motion for leave to amend, with proposed complaint;
June 5: Defendants to file opposition to motion; and
June 16: Plaintiffs to file reply in further support of motion.

This is Plaintiffs' first request for an extension of this schedule, which will not affect any other dates. We have conferred with Defendants, who consent to the schedule proposed herein.

We appreciate the Court's consideration of this request.

Respectfully submitted,

/s/ Samuel H. Rudman

SAMUEL H. RUDMAN

cc: All Counsel (via ECF)